

17 December 2012

Ms Megan Cunningham
Contact Officer – Adjudication Branch
Australian Competition and Consumer Commission
GPO Box 3131
Canberra ACT 2601

Dear Ms Cunningham

**Australian Newsagents' Federation Ltd application for authorisation A91349
- application amendment**

On 6 December 2012 the Australian Newsagents' Federation Ltd (ANF) lodged an application for authorisation to collectively bargain on behalf of its South Australian members in their capacity as distribution agents of lottery products for SA Lotteries.

Recently, the South Australian Government announced its intention to appoint Tatts Group to exclusively manage the lottery and wide area Keno service in South Australia for a period of 40 years on behalf of the Government owned Lotteries Commission of South Australia.

In light of this announcement the ANF wishes to amend its application by substituting and replacing the current target party with Tatts Group (ACN 108 686 040) following their exclusive appointment as manager of SA Lotteries.

The ANF has made a preliminary review of the proposed lottery agent agreement and at this stage does not intend to collectively bargain the terms of the agreement with the target party, nor seek interim authorisation. However, the ANF notes that the arrangement between its member lottery agents and SA Lotteries also encompasses the Agent Procedure Manual, Terminal Operator Guide and Point of Sale Operator Guide. Consequently, the ANF reserves the right to seek interim authorisation should the target party seek to amend the agent agreement or any other document relevant to the arrangement between its member lottery agents and SA Lotteries.

Notwithstanding the ANF's present intention not to seek interim collective bargaining authorisation, the ANF is acutely aware of the possibility that the incoming private operator of SA Lotteries will seek increasingly favourable commercial terms in respect of its network of lottery distribution agents throughout its appointment as exclusive manager of SA Lotteries.

www.anf.net.au



Accordingly, the ANF still wishes to proceed with its application to collectively bargaining with SA Lotteries on behalf of its South Australian lottery distribution members.

Should you have any further queries or require additional information, please contact me on 0417 144 994 or tas@anf.net.au.

Yours sincerely

Ben Kearney
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